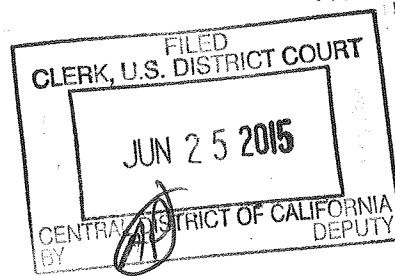


1 **PAUL MARTIN**
928 EAST TUCKER STREET
2 **COMPTON CA 90221**
IN PRO PER
NO EMAIL
3 NO FAX



7
CENTRAL DISTRICT OF CALIFORNIA

OWB REO LLC

Case No
CV 15-04810

GW(JPR)x

9 Plaintiff,

**NOTICE OF REMOVAL UNDER 28
U.S.C. §§ 1332, 1391, 1441(a)
and 1446**

10 vs.

11 **JACQUALINE D. DAVIS and**

**SUPERIOR COURT OF CALIFORNIA
CASE#**

12 DOES 1-5

13 Defendant

15UN0998

14
15
16 **TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR THE**
17 **CENTRAL DISTRICT OF CALIFORNIA AND THE PLAINTIFF AND ITS ATTORNEY OF**
18 **RECORD.**

19
20 Pursuant to 28 U.S.C. §§ 1332, 1391, 1341(a) and 1446, the
defendant, **PAUL MARTIN** Pro Se files this Notice of Removal of this
21 case from Superior Court of California County of
Los Angeles The United States District Court for the Central District
Californin. In support of this Notice of Removal, Defendant states

CASE BACKGROUND AND FOUNDATION FOR REMOVAL

22 1. On or about March 25, 2015 Plaintiffs commenced an action in
the Superior Court of California, in County of Los Angeles against the
23
24
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27

1 Defendant/Cross Plaintiff. The Defendant/Cross Plaintiff currently has
2 a pending Complaint filed against the Plaintiff for
3 Fraud, Fraudulent Inducement, Breach of Contract, Breach of Fiduciary
4 Duty, Conspiracy, Various Violations Of The California Civil Code,
5 Declaratory Relief, Intentional Misrepresentation, and other causes of
6 action against the Plaintiff of this case and various other lending
7 institutions that did not have proper title to Defendants property.

8 2. Defendant/Counter Plaintiff's presently seek judgment against
9 the Plaintiff for injuries that Defendant/Counter Plaintiff allegedly
10 suffered as a result of various violations under the Fair Debt
11 Collections Practices Act. Defendant/Counter Plaintiff's claims
12 against Plaintiff are based on Plaintiff's alleged misrepresentation
13 of the amount of debt due, and their own fraudulent actions.

14 3. True and correct copies of the Summons, Complaint and other
15 pleadings or orders are attached as Exhibit "A" and incorporated by
16 reference.

17 4. This Court has original jurisdiction over this matter pursuant
18 to 28 U.S.C. § 1331. Further this matter is one that may be removed to
19 this Court pursuant to 28 U.S.C. § 1441 because it is a civil action
20 based upon the Federal Debt Collections Practices Act.

21 5. Venue is proper in this Court because the State Court Action
22 is pending in the Superior Court of California, County of Los Angeles.
23 see 28 U.S.C. § 1441(a) .

24 **COMPLETE DIVERSITY OF CITIZENSHIP**

25
26
27 6. There is complete diversity of citizenship between the
28 parties.

1 (a) Plaintiff is incorporated in a state other than
2 California and its principal place of business is located
3 in states other than California. Thus the Plaintiff is not
4 a citizen of California.

5 (b) Defendant/Counter Plaintiff is a citizen of California,
6 residing in County of Los Angeles .

7
8 **AMOUNT IN CONTRAVERSY EXCEEDS \$75,000.00**

9
10 7. Plaintiff's do not quantify the amount of damages they seek to
11 recover this case. See Complaint, Prayers for Relief. From the face of
12 the Complaint, however, it is apparent that the amount in controversy
13 more likely than not exceeds \$75,000.00, Exclusive of interest and
14 costs.

15 8. "The amount in controversy is ordinarily determined by the
16 allegations of the Complaint, or when they are not dispositive, by the
17 allegations in the Notice of Removal". See Laughlin v. Kmart Corp., 50
18 F.3d 871, 873 (10th Cir), cert. denied, 516 U.S. 863 (1995).

19 9. When the Plaintiff's damages are unquantified in the
20 Complaint, in the amount in Controversy can established by Allegations
21 on the face of the Complaint. Cf. Martin v. Franklin Capital Corp., 251
22 F.3d 1284, 1290 (10th Cir, 2001). More specifically, the amount in
23 controversy requirement can be satisfied by showing it is facially
24 apparent from the Complaint that the claims more likely than not

25 Exceed \$75,000.00. See Allen v. R.H. Oil and Gas Co., 63 F.3d 1326,
26 1335 (5th Cir. 1995); accord Singer v. State Farm Mutual Automobile
27 Ins. Co., 116 F.3d 373, 377 (9th Cir. 1997); See also Gilmer v. The
28 Walt Disney Co., et al., 915 F. Supp. 1001, 1007 (W.D. Ark. 1996).

1 10. Here the amount in controversy most likely exceeds \$75,000.00
2 based on Plaintiffs' claims their alleged injuries and the recovery
3 sought.

4 11. Defendant/Counter Plaintiff denies the allegations in the
5 Complaint. Taking those Allegations on their face as true, however, as
6 this Court must do for the purpose of determining the propriety of
7 removal, it is clear that the Plaintiffs' claims, as evidenced by the
8 documents attached hereto as Exhibit "A", demonstrate an amount in
9 controversy in excess of \$75,000.00.

10 12. . Given the complete diversity of the real parties and an
11 amount in controversy in excess of \$75,000.00, this Court has
12 jurisdiction over the causes of action and the claims asserted in the
13 State Court Action pursuant to 28 U.S.C. § 1332, and this action
14 properly is removable pursuant to 28 U.S.C. § 1441.

15 13. Diversity jurisdiction further exists in this case based on
16 the following:

17 A. The Plaintiff OWB REO LLC, cannot state a claim for
18 return of damages to or diminution in volume of assets it
19 does not own, or can prove ownership.

20 B. Based on its lack of ownership of the subject property,
21 the Plaintiff, OWB REO LLC has no standing to bring the
22 claims set forth in their Complaint or Motion.

23 C. Due to the fact that OWB REO LLC cannot state a claim
24 upon which relief may be granted, the only proper party to
25 this action is the Defendant/Cross Plaintiff.

26 14. If the party with no standing is disregarded, this Court has
27 original jurisdiction over this action pursuant to 28 U.S.C. § 1332,
28 and this case may be removed to this Court pursuant to 28 U.S.C.
§ 1441 (a).

OTHER ISSUES

1 15. This notice is timely filed. See 28 U.S.C. § 1446(b)

2
3 16. This Notice of Removal has been served on Plaintiffs '
4 counsel. A Notice of Filing of Notice of Removal to Federal Court
5 (attached as Exhibit "A") will be filed in the Superior Court of
6 California, County of Los Angeles as soon as this Notice of
7 Removal has been filed in this Court.

8 17. A copy of the complete record maintained by the Clerk of the
9 Superior Court, County of Los Angeles, California is attached to
10 this Notice of Removal as Exhibit "A".

11 **CONCLUSION**

12 Because Plaintiffs' and Defendant are citizens of different
13 states, and the amount in controversy exceeds \$75,000.00 exclusive of
14 interests and costs, this Court has jurisdiction over Plaintiffs;
15 claim pursuant to 28 U.S.C. § 1332. Defendant are therefore entitled
16 to remove this case to this Court pursuant to 28 U.S.C. § 1441.

17 Wherefore, Defendant requests that the action now pending before
18 the Superior Court of California, County of Los Angeles, California,
19 CIVIL Action No. 15UN0998 must be removed to this Court.

20
21 Dated: 06/25/2015

22
23 

24 PAUL MARTIN, IN PRO PER
25
26
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CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that on 06/25/2015, served a copy
of:

NOTICE OF REMOVAL

By placing said copy in an envelope addressed to the person(s)
hereinafter named at the places and addresses shown below, which are
the last known addresses, and mailing said envelope and contents in
the U.S. Mail in Anaheim, California.

LAW OFFICES OF TFLG
202 COUSTEAU PL., SUITE 260
DAVIS, CA 95618

Alex Duarte

ALEX DUARTE

EXHIBIT "A"

SUM-130

**SUMMONS
(CITATION JUDICIAL)
UNLAWFUL DETAINER - EVICTION
(RETENCIÓN ILÍCITA DE UN INMUEBLE - DESALOJO)**

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**
JACQUALINE D. DAVIS, and DOES 1-5
**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**
OWB REO LLC

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)
**CONFORMED COPY
ORIGINAL FILED**
Superior Court of California
County of Los Angeles

MAR 25 2015

Sherri R. Carter, Executive Officer/Clerk

By Eduardo Chanes, Deputy

You have 5 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. (To calculate the five days, count Saturday and Sunday, but do not count other court holidays. If the last day falls on a Saturday, Sunday, or a court holiday then you have the next court day to file a written response.) A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

Tiene 5 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. (Para calcular los cinco días, cuente los sábados y los domingos pero no los otros días feriados de la corte. Si el último día cae en sábado o domingo, o en un día en que la corte esté cerrada, llene hasta el próximo día de corte para presentar una respuesta por escrito). Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org) en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. AVISO: Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

1. The name and address of the court is:
(El nombre y dirección de la corte es):
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
12720 NORWALK BOULEVARD, ROOM 101
NORWALK, CA 90850
NORWALK COURTHOUSE LIMITED CIVIL CASE

CASE NUMBER
(Número del caso):**15 UNO 998**

2. The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
TFLG A LAW CORPORATION
ERIC G. FERNANDEZ, ESQ. (SBN: 2696884)
NOAH M. BEAN, ESQ. (SBN: 257657)
202 COUSTEAU PLACE, SUITE 260, DAVIS, CALIFORNIA 95618
(530) 750-3700
3. (Must be Answered in all cases) An unlawful detainer assistant (Bus. & Prof. Code, §56400-5415) ☒ did not ☐ did for compensation give advice or assistance with this form. (If plaintiff has received any help or advice for pay from an unlawful detainer assistant, complete item 6 on the next page.)

Date: **MAR 25 2015****SHERRI R. CARTER**Clerk, by **EDUARDO CHANES**Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)

4. NOTICE TO THE PERSON SERVED: You are served

- a. ☐ as an individual defendant.
b. ☐ as the person sued under the fictitious name of (specify):
c. ☒ as an occupant
d. ☒ on behalf of (specify): **All Unknown Occupants**

under: ☐ CCP 416.10 (corporation)☐ CCP 416.20 (defunct corporation)☒ CCP 416.40 (association or partnership)☒ CCP 416.46 (occupant)☐ CCP 416.60 (minor)☐ CCP 416.70 (conservatee)☐ CCP 416.90 (authorized person)☐ other (specify):

- 5.
- ☐
- by personal delivery on (date):

Page 1 of 2

BY FAX

SUM-130

PLAINTIFF: OWB REO LLC	CASE NUMBER:
DEFENDANT: JACQUALINE D. DAVIS, and DOES 1-5	

6. Unlawful detainer assistant (complete if plaintiff as received any help or advice for pay from an unlawful detainer assistant):

a. Assistant's name:

b. Telephone no.:

c. Street address, city, and zip:

d. County of registration:

e. Registration no.:

f. Registration expires on (date):

NOTICE: EVERYONE WHO LIVES IN THIS RENTAL UNIT MAY BE EVICTED BY COURT ORDER. READ THIS FORM IF YOU LIVE HERE AND IF YOUR NAME IS NOT ON THE ATTACHED SUMMONS AND COMPLAINT.

1. If you live here and you do not complete and submit this form within 10 days of the date of service shown on this form, you will be evicted without further hearing by the court along with the persons named in the Summons and Complaint.
2. If you file this form, your claim will be determined in the eviction action against the persons named in the Complaint.
3. If you do not file this form, you will be evicted without further hearing.

CLAIMANT OR CLAIMANT'S ATTORNEY (Name and Address): PAUL MARTIN 928 EAST TUCKER STREET COMPTON CA 90221		TELEPHONE NO.:	FOR COURT USE ONLY CONFORMED COPY ORIGINAL FILED Superior Court of California County of Los Angeles APR 30 2015 Sherri R. Carter, Executive Officer/Clerk By Linda Oroz, Deputy
ATTORNEY FOR (Name):			
NAME OF COURT: LOS ANGELES SUPERIOR COURT NORWALK STREET ADDRESS: 12720 NORWALK BLVD MAILING ADDRESS: CITY AND ZIP CODE: NORWALK 90650 BRANCH NAME: NORWALK PLAINTIFF: OWB REO LLC DEFENDANT: JACQUALINE D. DAVIS			
PREJUDGMENT CLAIM OF RIGHT TO POSSESSION		CASE NUMBER: 15UN0998	
Complete this form only if ALL of these statements are true: 1. You are NOT named in the accompanying Summons and Complaint. 2. You occupied the premises on or before the date the unlawful detainer (eviction) Complaint was filed. 3. You still occupy the premises.		(To be completed by the process server) DATE OF SERVICE: (Date that this form is served or delivered, and posted, and mailed by the officer or process server)	

I DECLARE THE FOLLOWING UNDER PENALTY OF PERJURY:

1. My name is (specify):

Paul Martin

2. I reside at (street address, unit No., city and ZIP code):

928 East Tucker Street Compton Ca 90221

3. The address of "the premises" subject to this claim is (address):

928 East Tucker Street Compton Ca 90221

4. On (insert date): 3/25/2015, the landlord or the landlord's authorized agent filed a complaint to recover possession of the premises. (This date is the court filing date on the accompanying Summons and Complaint.

5. I occupied the premises on the date the complaint was filed (the date in item 4). I have continued to occupy the premises ever since.

6. I was at least 18 years of age on the date the complaint was filed (the date in item 4).

7. I claim a right to possession of the premises because I occupied the premises on the date the complaint was filed (the date in item 4).

8. I was not named in the Summons and Complaint.

9. I understand that if I make this claim of right to possession, I will be added as a defendant to the unlawful detainer (eviction) action.

10. (Filing fee) I understand that I must go to the court and pay a filing fee of \$ _____ or file with the court the form "Application for Waiver of Court Fees and Costs." I understand that if I don't pay the filing fee or file with the court the form for waiver of court fees within 10 days from the date of service on this form (excluding court holidays), I will not be entitled to make a claim of right to possession.

(Continued on reverse)

PLAINTIFF (Name): OWB REO LLC	CASE NUMBER: 15UN0998
DEFENDANT (Name): JACQUALINE D. DAVIS	

NOTICE: If you fail to file this claim, you will be evicted without further hearing.

11. (Response required within five days after you file this form) I understand that I will have five days (excluding court holidays) to file a response to the Summons and Complaint after I file this Prejudgment Claim of Right to Possession form.

12. Rental agreement. I have (check all that apply to you):

- a. ☒ an oral rental agreement with the landlord.
- b. ☐ a written rental agreement with the landlord.
- c. ☐ an oral rental agreement with a person other than the landlord.
- d. ☐ a written rental agreement with a person other than the landlord.
- e. ☐ other (explain):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

WARNING: Perjury is a felony punishable by imprisonment in the state prison.

Date: 04/30/2015

PAUL MARTIN
(TYPE OR PRINT NAME)

Paul Martin
(SIGNATURE OF CLAIMANT)

NOTICE: If you file this claim of right to possession, the unlawful detainer (eviction) action against you will be determined at trial. At trial, you may be found liable for rent, costs, and, in some cases, treble damages.

— NOTICE TO OCCUPANTS —

YOU MUST ACT AT ONCE if all the following are true:

1. You are NOT named in the accompanying Summons and Complaint.
2. You occupied the premises on or before the date the unlawful detainer (eviction) complaint was filed. (The date is the court filing date on the accompanying Summons and Complaint.)
3. You still occupy the premises.

(Where to file this form) You can complete and SUBMIT THIS CLAIM FORM WITHIN 10 DAYS from the date of service (on the reverse of this form) at the court where the unlawful detainer (eviction) complaint was filed.

(What will happen if you do not file this form) If you do not complete and submit this form and pay a filing fee or file the form for proceeding in forma pauperis if you cannot pay the fee, YOU WILL BE EVICTED.

After this form is properly filed, you will be added as a defendant in the unlawful detainer (eviction) action and your right to occupy the premises will be decided by the court. If you do not file this claim, you will be evicted without a hearing.

1 TFLG A LAW CORPORATION
ERIC G. FERNANDEZ, ESQ. (SBN: 269684)
2 NOAH M. BEAN, ESQ. (SBN: 257657)
202 COUSTEAU PLACE, SUITE 260
3 DAVIS, CALIFORNIA 95618
TELEPHONE: (530) 750-3700
4 FACSIMILE: (530) 750-3366

5 Attorney for Plaintiff
OWB REO LLC
6

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

MAR 25 2015

Sherri R. Carter, Executive Officer/Clerk
By Eduardo Chanes, Deputy

7 SUPERIOR COURT OF CALIFORNIA
8 COUNTY OF LOS ANGELES
9 NORWALK COURTHOUSE
10 LIMITED CIVIL CASE

11 OWB REO LLC,
12 Plaintiff,

13 v.

14 JACQUALINE D. DAVIS, and DOES 1-5,
15 Defendants.
16

Case No. 15 UNO 998

VERIFIED COMPLAINT FOR
UNLAWFUL DETAINER

Code of Civ. Proc. §§ 1161 *et seq.*

AMOUNT DEMANDED DOES NOT
EXCEED \$10,000

17 Plaintiff alleges:

18 1. Plaintiff is, and was at all times mentioned herein, qualified to do business
19 in California or exempt from qualification under Corporations Code Section 191(d).

20 2. The real property, possession of which is sought in this action, is situated in
21 LOS ANGELES County, California, in the above-named judicial district, and is commonly described
22 as: 928 East Tucker Street, Compton, California 90221, Assessor's Parcel Number 6167-029-010
23 ("the Property").

24 3. The true names and capacities of Does 1 through 5, inclusive, are presently
25 unknown to Plaintiff, who therefore sues such defendants under such fictitious names pursuant to
26 Code of Civil Procedure Section 474. Plaintiff is informed and believes, and on such information
27 and belief alleges, that each such "Doe" defendant is in possession of the Property, without the
28 permission or consent of Plaintiff, and Plaintiff will amend this complaint to state the true names and

1 capacities of said defendants when the same have been ascertained.

2 4. On December 5, 2014, the Property was sold to Plaintiff in accordance with
3 Civil Code Section 2924 et seq. under a power of sale contained in a Deed of Trust recorded August
4 8, 2007, executed by JACQUALINE D. DAVIS, a single woman, as trustor. Plaintiff's title pursuant
5 to the sale has been duly perfected and a Trustee's Deed conveying title to Plaintiff has been duly
6 recorded in the official records of the county in which the Property is situated. A true and correct
7 copy of the Trustee's Deed is attached hereto, marked as Exhibit "A", and incorporated herein by
8 this reference.

9 5. Plaintiff is the owner of, and entitled to immediate possession of the Property.

10 6. On December 19, 2014, in the manner provided by law, Plaintiff caused to
11 be served on Defendant a written notice requiring Defendant to vacate and deliver up possession of
12 the Property to Plaintiff within ninety (90) days after service of said notice. A true and correct copy
13 of said Notice is attached hereto, marked as Exhibit "B", and made a part hereof. The Notice was
14 served in the manner provided by law and as more particularly described in the attached Proof of
15 Service, marked as Exhibit "C", which is incorporated herein by this reference.

16 7. More than ninety (90) days have elapsed since the service of said Notice, but
17 Defendant has failed and refused to deliver up possession of the Property.

18 8. Defendant continues in possession of the Property without Plaintiff's
19 permission or consent.

20 9. The reasonable value for the use and occupancy of the Property is the sum of
21 \$40.00 per day, and damages to Plaintiff caused by Defendant's unlawful detention thereof has
22 accrued at said rate since March 20, 2015, and will continue to accrue at said rate so long as
23 Defendant remains in possession of the Property.

24 10. Pursuant to Evidence Code Section 453, Plaintiff states that at the time of
25 trial it will request judicial notice be taken of certified copy of the recorded document referred to in
26 paragraph four (4) hereof and all proofs of service then on file herein.

27 ///

28 ///

1 WHEREFORE, Plaintiff prays judgment against Defendant as follows:

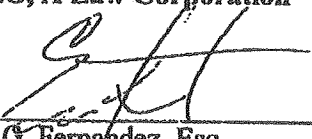
- 2 1. For restitution and possession of the Property;
- 3 2. For damages in the amount of \$40.00 per day from March 20, 2015, and for
- 4 each day that Defendant continues in possession of the Property through the
- 5 date of entry of judgment; and
- 6 3. For costs and for such other and further relief as the court may deem just and
- 7 proper.

8

9 TFLG, A Law Corporation

10

11 Dated: March 23, 2015

12 By: 
13 Eric G. Fernandez, Esq.
14 Attorney for Plaintiff
15 OWB REO LLC
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VERIFICATION

I, the undersigned, declare:

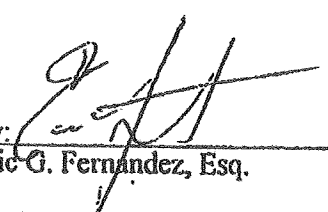
I have read the foregoing Verified Complaint For Unlawful Detainer and know its contents.

I am the attorney for OWB REO LLC, a party to this action. Such is absent from the county where I have my office. For that reason, I am making this verification for and on behalf of that party.

I am informed and believe and on that basis allege that the matters stated in said document are true and correct.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 23rd day of March, 2015, at Davis, California.

By: 
Eric G. Fernandez, Esq.